

JUN-30-2008 12:26



U.S. Department of Justice

United States Attorney
Southern District of New YorkThe Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

MEMO ENDORSED

June 30, 2008

7/1/08
 MATTER ADJ. TO 8/1/08
 AT 9:30 AM. TIME EXCLUDED
 IN THE INTEREST OF JUSTICE

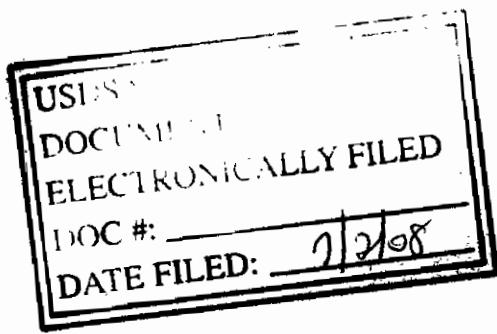
BY FACSIMILE: (212) 805-6326
 The Honorable Colleen McMahon
 United States District Court
 Southern District of New York
 500 Pearl Street
 New York, New York 10007

Re: United States v. Mutholib Sanni and Francia Tabares
 07 Cr. 999 (CM)

Dear Judge McMahon:

The Government respectfully submits this letter, after speaking with Your Honor's Deputy, to request jointly with the defense an adjournment of the pre-trial conference currently scheduled for July 1, 2008, to a date convenient for the Court after the last week in July 2008.

The Government also respectfully requests that time be excluded for purposes of the Speedy Trial Act from July 1 through the new conference date. The Government makes this request, with the consent of defense counsel, for the Government and the defense to continue to pursue discussions regarding a possible disposition before trial.



Respectfully submitted,

MICHAEL J. GARCIA
United States Attorney

By:

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Assistant U.S. Attorney
(212) 637-1113

cc: Roy Kulcsar, Esq., counsel for Francia Tabares (fax: 201-439-1478)
 John M. Murphy, Jr., Esq., counsel for Mutholib Sanni (fax: 718-448-8685)